Section 1. Registration Information

Source Identification

Facility Name:	Chemours Chambers Works
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Process no longer covered (source has other processes that remain covered) (40 CFR 68.190(b)(7))
Description:	
Receipt Date:	16-Sep-2019
Postmark Date:	16-Sep-2019
Next Due Date:	16-Sep-2024
Completeness Check Date:	14-Oct-2021
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	

Facility Identification

EPA Facility Identifier:	1000 0022 9102
Other EPA Systems Facility ID:	NJD002385730
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	79550878
Parent Company #1 DUNS:	79550093
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	67 Canal Road
Street 2:	P.O. Box 9001
City:	Deepwater
State:	NEW JERSEY
ZIP:	08023
ZIP4:	
County:	SALEM

Facility Latitude and Longitude

Latitude (decimal):	39.691667
Longitude (decimal):	-075.508333
Lat/Long Method:	Classical Surveying Techniques
Lat/Long Description:	Administrative Building
Horizontal Accuracy Measure:	25

Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	The Chemours Company FC LLC
Operator Phone:	(856) 540-2600

Mailing Address

Operator Street 1:	67 Canal Road, P.O. Box 9001
Operator Street 2:	Pedersen Building
Operator City:	Deepwater
Operator State:	NEW JERSEY
Operator ZIP:	08023
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Scott T. Northey
RMP Title of Person or Position:	Site Environmental Manager
RMP E-mail Address:	scott.t.northey@chemours.com

Emergency Contact

Emergency Contact Name:	John T. Stranahan
Emergency Contact Title:	Site ER/Security Leader
Emergency Contact Phone:	(856) 540-2015
Emergency Contact 24-Hour Phone:	(856) 540-3512
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	john.stranahan@chemours.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Salem County OEM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	377
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes

EPCRA 302 :	Yes
CAA Title V:	Yes
Air Operating Permit ID:	65473

OSHA Ranking

OSHA Star or Merit Ranking:	

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	07-Dec-2018
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:	

Preparer Information

Preparer Name:	Scott Northey
Preparer Phone:	(856) 540-2012
Preparer Street 1:	67 Canal Road
Preparer Street 2:	Pedersen Building
Preparer City:	Deepwater
Preparer State:	NEW JERSEY
Preparer ZIP:	08023
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:	
Substantiation Provided:	
Unsanitized RMP Provided:	

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000102024
Description:	PC Capstone Intermediates
Process Chemical ID:	1000127878
Program Level:	Program Level 3 process
Chemical Name:	Oleum (Fuming Sulfuric acid) [Sulfuric acid, mixture with sulfur trioxide]
CAS Number:	8014-95-7
Quantity (lbs):	177279
CBI Claimed:	

Flammable/Toxic:	Toxic

Process ID:	1000102024
Description:	PC Capstone Intermediates
Process Chemical ID:	1000127879
Program Level:	Program Level 3 process
Chemical Name:	Ethylene [Ethene]
CAS Number:	74-85-1
Quantity (lbs):	51635
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000102025
Description:	Elastomers
Process Chemical ID:	1000127880
Program Level:	Program Level 3 process
Chemical Name:	Tetrafluoroethylene [Ethene, tetrafluoro-]
CAS Number:	116-14-3
Quantity (lbs):	58000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000102025
Description:	Elastomers
Process Chemical ID:	1000127881
Program Level:	Program Level 3 process
Chemical Name:	Hydrogen chloride (anhydrous) [Hydrochloric acid]
CAS Number:	7647-01-0
Quantity (lbs):	43000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000102025
Description:	Elastomers
Process Chemical ID:	1000127882
Program Level:	Program Level 3 process
Chemical Name:	Vinylidene fluoride [Ethene, 1,1-difluoro-]
CAS Number:	75-38-7
Quantity (lbs):	176000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000102026
Description:	PC Krytox
Process Chemical ID:	1000127883

Program Level:	Program Level 3 process
Chemical Name:	Fluorine
CAS Number:	7782-41-4
Quantity (lbs):	2000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000102024
Process NAICS ID:	1000103306
Program Level:	Program Level 3 process
NAICS Code:	325613
NAICS Description:	Surface Active Agent Manufacturing

Process ID:	1000102025
Process NAICS ID:	1000103307
Program Level:	Program Level 3 process
NAICS Code:	32629
NAICS Description:	Other Rubber Product Manufacturing

Process ID:	1000102026
Process NAICS ID:	1000103308
Program Level:	Program Level 3 process
NAICS Code:	325199
NAICS Description:	All Other Basic Organic Chemical Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000081663

Percent Weight:	67.0
Physical State:	Liquid
Model Used:	PHAST (v6.7)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	Yes
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000087179

Percent Weight:	67.0
Physical State:	Liquid
Model Used:	EPA's OCA Guidance Reference Tables or Equations
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Release rate based on pool evaporation rate

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Toxic Alter ID: 1000087180

Percent Weight:	47.0
Physical State:	Gas
Model Used:	PHAST (v6.7)
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	

Emergency Shutdown:	Yes
Other Type:	

Toxic Alter ID: 1000087181

Percent Weight:	20.0
Physical State:	Gas
Model Used:	PHAST
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	Yes
Emergency Shutdown:	
Other Type:	Operator interface/action

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000061002

Model Used:	EPA's OCA Guidance Reference Tables or Equations
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:

Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000057339

Model Used:	EPA's OCA Guidance Reference Tables or Equations

Passive Mitigation Considered

Dikes:	
Fire Walls:	Yes
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Excess Flow Valve:	
Other Type:	Emergency shut off valves, water cannons

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000107541
Chemical Name:	Oleum (Fuming Sulfuric acid) [Sulfuric acid, mixture with sulfur trioxide]
Flammable/Toxic:	Toxic
CAS Number:	8014-95-7
Process ID:	1000102024
Description:	PC Capstone Intermediates
Prevention Program Level 3 ID:	1000086198
NAICS Code:	325613
Prevention Program Chemical ID:	1000107542
Chemical Name:	Ethylene [Ethene]
Flammable/Toxic:	Flammable
CAS Number:	74-85-1
Process ID:	1000102024
Description:	PC Capstone Intermediates
Prevention Program Level 3 ID:	1000086198
NAICS Code:	325613

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	30-May-2019

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	24-Apr-2019

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-Nov-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	

Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	Yes
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Level device design

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	29-May-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs):	01-Jun-2017

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer based training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	06-Jun-2019

Equipment Inspection Date (The date of the most recent equipment inspection or test):	04-Jun-2019
Equipment Tested (Equipment most recently inspected or tested):	234-A14 Packing Inspection

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	28-Jun-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Apr-2017

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	02-May-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	07-Dec-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	01-Jun-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	10-Nov-2018
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	28-Jun-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-Jun-2016

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Jul-2016

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Oct-2017

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Aug-2018

Confidential Business Information

CBI Claimed:

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000107544
Chemical Name:	Hydrogen chloride (anhydrous) [Hydrochloric acid]
Flammable/Toxic:	Toxic
CAS Number:	7647-01-0

Process ID:	1000102025
Description:	Elastomers
Prevention Program Level 3 ID:	1000086199
NAICS Code:	32629

Prevention Program Chemical ID:	1000107545
Chemical Name:	Vinylidene fluoride [Ethene, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-38-7

Process ID:	1000102025
Description:	Elastomers
Prevention Program Level 3 ID:	1000086199
NAICS Code:	32629

Prevention Program Chemical ID:	1000107543
Chemical Name:	Tetrafluoroethylene [Ethene, tetrafluoro-]
Flammable/Toxic:	Flammable
CAS Number:	116-14-3

Process ID:	1000102025
Description:	Elastomers
Prevention Program Level 3 ID:	1000086199
NAICS Code:	32629

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	27-Aug-2018

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	17-Dec-2018

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-Nov-2019

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	Yes
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	Yes
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	Yes
Blast Walls:	Yes
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	28-Feb-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs):	20-May-2016

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	03-Jun-2019
Equipment Inspection Date (The date of the most recent equipment inspection or test):	15-Mar-2019
Equipment Tested (Equipment most recently inspected or tested):	745-5320-XT

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	08-Mar-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Apr-2017

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	09-Nov-2018

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	07-Dec-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	01-Jun-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	11-Dec-2018
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	31-May-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-Jun-2016

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Jul-2016

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Oct-2017
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Aug-2018

Confidential Business Information

CBI Claimed:

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000107546
Chemical Name:	Fluorine
Flammable/Toxic:	Toxic
CAS Number:	7782-41-4
Process ID:	1000102026
Description:	PC Krytox
Prevention Program Level 3 ID:	1000086200
NAICS Code:	325199

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	25-Jun-2018

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	31-Dec-2014

The Technique Used

What If:	Yes
Checklist:	Yes
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-Oct-2015

Major Hazards Identified

Toxic Release:	Yes
Fire:	
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	

Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	
Keyed Bypass:	Yes
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	Yes
Excess Flow Device:	Yes
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	Yes
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	
Installation of Process Controls:	

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	02-Jul-2019

Training

Training Revision Date (The date of the most recent review or revision of training programs):	01-Jun-2017

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	09-Apr-2015
Equipment Inspection Date (The date of the most recent equipment inspection or test):	20-Aug-2014
Equipment Tested (Equipment most recently inspected or tested):	PRD-J26-636

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	03-Jun-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Apr-2017

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	11-Jul-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	07-Dec-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	01-Jun-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	07-Mar-2019
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	03-Jul-2019

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-Jun-2016

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Jul-2016

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Oct-2017
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Aug-2018

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	17-Jan-2019

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	23-May-2019

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Salem County OEM
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(609) 769-2900

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	State Release Prevention

Executive Summary

Accidental Release and Emergency Response Policies

The Chemours Chambers Works facility is committed to operating and maintaining all manufacturing processes in a safe and responsible manner. The site follows the philosophy "Commitment to ZERO", which constantly strives for zero process safety incidents, zero environmental incidents and zero injuries. Site programs, procedures and management practices are in place to support our organizations commitment. Progress is constantly assessed against our commitment and corrective actions are taken whenever necessary. Although the primary focus of the facility is on accidental release prevention, the site also possesses and maintains strong emergency response capabilities to back-up prevention activities. The combination of prevention programs and emergency response capabilities is used to ensure the safety of our employees and the public, as well as, the protection of the environment. This document provides a brief overview of the comprehensive risk management activities that we have designed and implemented, including:

¿ A description of our facility and use of substances regulated by New Jersey's Toxic Catastrophe Prevention Act (TCPA) Risk Management Program regulation;
¿ A summary of results from our assessment of the potential off-site consequences from accidental chemical releases;
¿ An overview of our accidental release prevention programs;
¿ An overview of our Emergency Response program;
¿ A five-year history of accidental release of chemicals regulated by the TCPA rule;
¿ An overview of planned improvements at the facility to help prevent accidental chemical releases from occurring and adversely affecting our employees, the public, and the environment.

Stationary Source and Regulated Substances

The Chambers Works facility first opened in the early 1900s as a dye manufacturing plant. On July 1, 2015, DuPont spun off the Performance Chemicals business into a new company (The Chemours Company FC LLC). Chemours became the owner/operator of the facility and DuPont, at the time, maintained a presence at the site, operating two manufacturing units. As of mid-2018, DuPont presence has decreased to one manufacturing unit which is not a TCPA/RMP covered process.

The following chemicals are used and covered under TCPA/RMP program management at Chemours Chambers Works:

Toxics:
¿ Fluorine
¿ Hydrogen Chloride (anhydrous)
¿ Oleum 65% by weight

Flammables:
¿ Tetrafluorethylene
¿ Ethylene
¿ Vinylidene Fluoride

Key Off-site Consequence Analysis Scenarios

To help with understanding the potential impact on the community due to a release of chemicals from Chambers Works, information is provided about the worst-case release scenarios and alternative release scenarios for the Chambers Works facility. These scenarios were developed using the guidance and technical data supplied by the EPA. Scenario information has been used on Chambers Works for many years as part of our process safety management program. Our program parameters model potential releases and analyze the results to help the site continuously improve process and risk reduction efforts. The site continues to conduct these assessments as part of internal process safety management systems. Release scenario details can be found in the site's Risk Management Plan.

Accidental Release Prevention Program

For many years, employees at Chambers works have applied rigorous process safety management practices to all our processes, not just those covered by regulations. These practices include:
¿ A thorough understanding of our process technology including the safe limits of the processes and the proper materials of constriction for equipment;
¿ Proper design and installation of equipment:
¿ Systematic process hazard review studies to identify and manage process hazards;
¿ Written operating and maintenance procedures;
¿ Extensive training for all individuals involved in operating or maintaining a chemical process;
¿ Mechanical integrity testing and preventive maintenance to detect potential equipment problems early;
¿ Mechanical quality assurance programs to ensure the correct spare parts are installed every time maintenance work is done;
¿ Procedures to assess and manage the safety and environmental impact of changes to the process technology or equipment;
¿ Pre-startup safety reviews for equipment that is newly installed or modified;
¿ Compliance audits to ensure process safety and environmental impact of changes to the process technology or equipment;
¿ Investigation of actual and potential incidents to identify and implement corrective actions;
¿ Participation of all employees in the process safety management system;
¿ Document safe work practices, including hot work permits; and
¿ A contractor management system to ensure work done by contractors is done safely and meets corporate quality standards.

In addition to the practices described above, site personnel have designed site processes to include multiple layers of safeguards. Examples of these include:
¿ Automatic valves for rail cars, which isolate the supply of materials form the rail car in event of a process upset;
¿ Computer display and control of process parameters;
¿ Process alarms to warn operators of process deviations;
¿ Interlocks to automatically shut down processes for certain process deviations;
¿ Low concentration chemical detectors that either provide alarms to operators or automatically isolate leaks if the chemical is detected;
¿ Relief valves to prevent over-pressuring of equipment
¿ Emergency scrubbers to prevent emissions from emergency systems from reaching the environment;
¿ Excess flow valves that close automatically if the chemical flow rate indicates a potential line leak;
¿ Deluge systems built into the process to quickly suppress chemical fumes or fires;
¿ Check valves to prevent cross contamination of chemicals;
¿ Camera surveillance of process area in central control rooms;
¿ Fire prevention activities like electrical grounding, inserting flammables with nonflammable gases and hot work permitting;
¿ 100% operator surveillance during transfer of hazardous material from shipping containers; and
¿ Minimization of hazardous material storage inventories, including manufacturing some highly hazardous materials only when we can immediately consume them to make products.

Emergency Response Program

In addition to release prevention measures, Chambers Works maintains a highly trained and equipped Emergency Response department. They are able to respond to any chemical release to mitigate the impact. The site is committed to maintaining strong emergency response capabilities to back-up our prevention activities. The Emergency Response brigade is comprised of both Chemours and DuPont employees and are specially trained operators that can respond in the event of an onsite chemical release. The Emergency Response team is thoroughly trained, properly equipped and staffed 24 hours a day. Chambers Works conducts practice drills with the local community and emergency response organizations. These drills simulate potential accidental release and test emergency response plans. Chambers Works also supports a siren system in the local community that would provide early warning for a potential release. This system is coordinated with the Salem County Office of Emergency Response. In addition to on-site activities, Chambers works maintains transportation emergency response capability, which allows the site to respond to chemical transportation incidents outside the Chambers Works site.

Five-year Accident History

There have been no incidents in the past 5 years that meet the Risk Management Plan reporting criteria.

Planned Changes to Improve Safety

As part of our process hazards review procedures, all of our processes are thoroughly studied on a periodic basis to identify risk reduction opportunities. As a result of these studies, we are currently assessing and/or implementing the following risk reduction activities:

¿ Improving the control of the process by installing better instrumentation, more automatic process shutdown interlocks, and upgraded computer control systems;

¿ Improving preventive maintenance inspections and data analysis;

¿ Improving our training programs; and

¿ Conducting process safety audits to identify upgrades and improvement opportunities

¿ Assessment of inherently safer technologies